

Envision Technology Advisors, LLC
999 Main Street, Suite 715
Pawtucket, RI 02860
SPIN: 143042980

September 27, 2019

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

**Re.: Supplement to Request for Waiver on Docket No. 02-6 for E-Rate
(Confirmation Number 20190723483909121)**

Greetings,

This letter is to file supplement to the request for a waiver previously filed regarding payment of a Form 474 invoice we submitted on May 22, 2018 for Category 1 E-Rate services provided for Funding Year 2017 to our client Sturgis Charter School in Hyannis, Massachusetts. We have come to understand that there was confusion in how the Form 474 was submitted, relative to the service start date and when the "invoice date" was specified. Please reference the initial waiver request filing with confirmation number indicated above.

It had been more than 60 days since the submission of the waiver request, so we contacted the FCC for more information. I was directed to James Bachtel (202-418-2694) who explained to me the circumstances as to why this invoice had not yet been paid. We understand now that the issue is primarily the fact that on the Form 474 that we submitted we indicated that the date of the invoice to the school was July 1, 2017, which was prior to the beginning of the second half of the term of services beginning on January 1, 2018. As a point of fact, we thought that the invoice date was synonymous with the first day of the E-Rate period, which was why we indicated July 1, 2017 as the invoice date. (It's worth noting that the E-Rate period starting July 1, 2017 was the first period that we have transacted E-Rate business, so this point was not clearly understood.) However, it should be noted that the date that we submitted our Form 474 to USAC was May 22, 2018, well after the point that the period corresponding to the FRN for which we are seeking committed payment had begun (which was Jan 1, 2018). As such, we did not bill USAC out of bounds, and it was not submitted late either. It was only through follow up by our Accounting department as to delinquent payment status that these circumstances were discovered.

When following up with James, he suggested to submit a supplemental filing explaining further and providing additional information related to the timing of our invoicing, 474 filing, and subsequent follow-up inquiries for payment status. Attached to this supplemental filing is the Form 474 again, as well as two emails detailing our payment inquiries to USAC since the Form 474 filing.



We understand that reimbursement deadlines have now passed for Funding Year 2017, but in light of these circumstances, we respectfully ask that we be granted a waiver such that payment for invoice ID 2814657 may be released.

Thank you for your continued consideration!

Respectfully,

Brent K. Ouellette
Vice President Vendor Operations

Enc.:
Form 474 ID 2814657 identifier Sturgis-C1-23459-A
Initial Email Inquiry to USAC - July 8 2019
Email Inquiry to USAC - July 12 2019